

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:	:	
	:	Chapter 11
	:	
CFO MANAGEMENT HOLDINGS, LLC,¹	:	Case No. 19-40426
	:	
Debtor.	:	Jointly Administered
	:	

**CPIF LENDING, LLC’S WITNESS AND EXHIBIT LIST FOR JULY 14, 2020 HEARING
ON (I) MOTION TO CONVERT AND (II) MOTION FOR
APPROVAL OF DISCLOSURE STATEMENT**

CPIF Lending, LLC, party in interest and creditor (“CPIF”), designates that the exhibits and witnesses set forth below that may be used in connection with the hearing on (I) *Motion of CPIF Lending, LLC to Convert Cases from Chapter 11 to Chapter 7 of the Bankruptcy Code* [Docket No. 448] and (II) *Chapter 11 Trustee’s Motion for Entry of an Order: (1) Approving the Disclosure Statement; (2) Scheduling a Hearing to Consider Confirmation of the Chapter 11 Trustee’s Plan of Liquidation for Debtor CFO Management Holdings, LLC; (3) Establishing Voting and Objection Deadlines; and (4) Approving Balloting, Solicitation, Notice, and Voting Procedures* [Docket No. 450] in the above-captioned case.

CPIF WITNESSES

1. Any witness called or designated by any other party in interest;
2. Any witness necessary to authenticate a document; and

¹ The following entities’ bankruptcy cases and estates have been substantively consolidated with that of Debtor CFO Management Holdings, LLC (EIN# XX-XXX6987) for all purposes (see Docket No. 248): Carter Family Office, LLC (Case No. 19-40432); Christian Custom Homes, LLC (Case No. 19-40431); Double Droptine Ranch, LLC (Case No. 19-40429); Frisco Wade Crossing Development Partners, LLC (Case No. 19-40427); Kingswood Development Partners, LLC (Case No. 19-40434); McKinney Executive Suites at Crescent Parc Development Partners, LLC (Case No. 19-40428); North-Forty Development LLC (Case No. 19-40430); and West Main Station Development, LLC (Case No. 19-40433). The following mailing address can be used for the consolidated Debtor with respect to these cases: c/o David Wallace, Chapter 11 Trustee, 4131 North Central Expressway, Suite 775, Dallas, Texas 75204.

3. Any witness necessary to impeach or rebut the testimony of witnesses called or designated by any other party.

CPIF EXHIBITS

NO.	DESCRIPTION	OFFER	OBJ	ADMIT DATE	NOT/AD DATE
1	<i>Motion of CPIF Lending, LLC to Convert Cases from Chapter 11 to Chapter 7 of the Bankruptcy Code [Docket No. 448]</i>				
2	<i>Chapter 11 Trustee's Objection to Motion of CPIF Lending, LLC to Convert Cases from Chapter 11 to Chapter 7 of the Bankruptcy Code [Docket No. 481]</i>				
3	<i>Reply of CPIF Lending, LLC in Support of its Motion to Convert Cases from Chapter 11 to Chapter 7 of the Bankruptcy Code [Docket No. 489]</i>				
4	<i>Chapter 11 Trustee's Motion for Entry of an Order: (1) Approving the Disclosure Statement; (2) Scheduling a Hearing to Consider Confirmation of the Chapter 11 Trustee's Plan of Liquidation for Debtor CFO Management Holdings, LLC; (3) Establishing Voting and Objection Deadlines; and (4) Approving Balloting, Solicitation, Notice, and Voting Procedures [Docket No. 450]</i>				
5	<i>Objection of CPIF Lending, LLC to Chapter 11 Trustee's Proposed Disclosure Statement Under 11 U.S.C. § 1125 in Support of Chapter 11 Trustee's Second Amended Plan of Liquidation for Debtor CFO Management Holdings, LLC [Docket Nos. 483 and 484 (Exhibit A to Objection)]</i>				
6	<i>Chapter 11 Trustee's Reply to Objection of CPIF Lending, LLC to Chapter 11 Trustee's Proposed Disclosure Statement Under 11 U.S.C. § 1125 in Support of Chapter 11 Trustee's Second Amended Plan of Liquidation for Debtor CFO Management Holdings, LLC [Docket No. 487]</i>				
7	<i>[Proposed] Disclosure Statement Under 11 U.S.C. § 1125 in Support of Chapter 11 Trustee's Second Amended Plan of Liquidation for Debtor CFO Management Holdings, LLC [Docket No. 445]</i>				

NO.	DESCRIPTION	OFFER	OBJ	ADMIT DATE	NOT/AD DATE
8	<i>Chapter 11 Trustee's Second Amended Plan of Liquidation for Debtor CFO Management Holdings, LLC</i> [Docket No. 444]				
9	<i>Chapter 11 Trustee's First Amended Plan of Liquidation for Debtor CFO Management Holdings, LLC</i> [Docket No. 433]				
10	<i>Judgment as to Defendant North-Forty Development, LLC</i> [SEC Docket No. 75] ²				
11	<i>Judgment as to Relief Defendant McKinney Executive Suites at Crescent Parc Development Partners, LLC</i> [SEC Docket No. 76]				
12	<i>Judgment as to Relief Defendant Frisco Wade Crossing Development Partners, LLC</i> [SEC Docket No. 77]				
13	<i>Judgment as to Relief Defendant Double Droptine Ranch, LLC</i> [SEC Docket No. 78]				
14	<i>Judgment as to Relief Defendant Christian Custom Homes, LLC</i> [SEC Docket No. 79]				
15	<i>Monthly Operating Report for the Month Ending March 2020</i> [Docket No. 412]				
16	<i>Monthly Operating Report for the Month Ending April 2020</i> [Docket No. 438]				
17	<i>Monthly Operating Report for the Month Ending May 2020</i> [Docket No. 473]				
18	Any exhibits designated by any other party				
19	Any exhibits necessary for rebuttal, impeachment or refreshing the recollection of witnesses				
20	Any additional exhibits used for demonstrative purposes only				
21	Any motion or pleading filed of record				

CPIF incorporates in the Exhibit List the pleadings and other papers filed in this bankruptcy case, related bankruptcy cases, and related adversary proceedings, other court filings, as permitted by the rules and applicable authority, including Federal Rules of Evidence Rule 201. CPIF further

² "SEC Docket" refers to the case currently pending in the United States District Court for the Eastern District of Texas-Sherman Division and captioned as *Securities and Exchange Commission v. Phillip Michael Carter, Individually and d/b/a North Forty Development Capital Account, et al.*; C.A. No. 4:19-cv-00100.

reserves the right to introduce or rely upon any exhibit designated by any party and to introduce any exhibit, document, or information to rebut or impeach any statement or testimony.

Dated: July 9, 2020

Respectfully submitted,

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/s/ Sven T. Nylén
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Counsel to CPIF Lending, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 9, 2020, a true and correct copy of the foregoing document was served electronically by the Court's electronic filing notification system.

/s/ Sven T. Nylén

Sven T. Nylén (IL #6278148; admitted E.D. Tex.)